

Teny Geragos

From: Teny Geragos
Sent: Wednesday, June 4, 2025 9:30 PM
To: Subramanian NYSD Chambers; Comey, Maurene (USANYS); Johnson, Emily (USANYS) 2; Foster, Meredith (USANYS); Slavik, Christy (USANYS); Steiner, Mitzi (USANYS); Smyser, Madison (USANYS); Marc Agnifilo; Alexandra Shapiro; Anna Estevao; Jason A. Driscoll; nw@westmorelandlawgroup.com; xdonaldson; thesteellawfirm
Subject: RE: US v Combs - 6/4/25 Trial Issues

Dear Chambers:

Since court adjourned, the defense has been working to narrow our disputes even further. In the meantime, we will work with the government to ensure we can get these exhibits uploaded, as it doesn't appear that the defense has USAfx permissions to share with the Court.

Respectfully,
Teny

From: Subramanian NYSD Chambers <SubramanianNYSDChambers@nysd.uscourts.gov>
Sent: Wednesday, June 4, 2025 8:35 PM
To: Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>; Teny Geragos <teny@agilawgroup.com>; Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>; Foster, Meredith (USANYS) <Meredith.Foster@usdoj.gov>; Slavik, Christy (USANYS) <Mary.Slavik@usdoj.gov>; Steiner, Mitzi (USANYS) <Mitzi.Steiner@usdoj.gov>; Smyser, Madison (USANYS) <Madison.Smyser@usdoj.gov>; Marc Agnifilo <marc@agilawgroup.com>; Alexandra Shapiro <ashapiro@shapiroarato.com>; Anna Estevao <aestevao@harristrz.com>; Jason A. Driscoll <jdriscoll@shapiroarato.com>; nw@westmorelandlawgroup.com; xdonaldson <xdonaldson@aol.com>; thesteellawfirm <thesteellawfirm@msn.com>
Subject: RE: US v Combs - 6/4/25 Trial Issues

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Dear Counsel,

The parties should ensure that the Jane-related Government Exhibits still in dispute are promptly uploaded to USAfx for the Court's review.

Chambers of The Honorable Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

From: Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>
Sent: Wednesday, June 4, 2025 12:31 AM
To: Teny Geragos <teny@agilawgroup.com>; Subramanian NYSD Chambers <SubramanianNYSDChambers@nysd.uscourts.gov>; Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>; Foster, Meredith (USANYS) <Meredith.Foster@usdoj.gov>; Slavik, Christy (USANYS) <Mary.Slavik@usdoj.gov>; Steiner, Mitzi

(USANYS) <Mitzi.Steiner@usdoj.gov>; Smyser, Madison (USANYS) <Madison.Smyser@usdoj.gov>
Cc: Marc Agnifilo <marc@agilawgroup.com>; Alexandra Shapiro <ashapiro@shapiroarato.com>; Anna Estevao
<aestevao@harristrz.com>; Jason A. Driscoll <jdriscoll@shapiroarato.com>; nw@westmorelandlawgroup.com;
xdonaldson <xdonaldson@aol.com>; thesteellawfirm <thesteellawfirm@msn.com>
Subject: RE: US v Combs - 6/4/25 Trial Issues

CAUTION - EXTERNAL:

Good evening,

I write to update the Court on the status of the parties' discussions regarding exhibits that may be offered in connection with Jane's testimony. The parties have continued to have very productive conferrals, which have further narrowed evidentiary disputes with respect to this witness. None of the Government Exhibits that remain in dispute will come up during Jane's testimony on Wednesday, so the Court need not resolve those disputes before Thursday morning. The parties will plan to file substantive letters on the outstanding issues by Wednesday evening.

As a preview, below are the Jane-related Government Exhibits that remain in dispute.

- The defense has raised FRE 106 objections to several Government Exhibits containing portions of text message exchanges between Jane and the defendant. The Government has agreed to modify some of its exhibits to address FRE 106 concerns, but does not believe further adjustments are necessary within the meaning of the Rule. Below are the Government Exhibits that remain in this disputed category:
 - A-104-13 through A-104-15
 - A-104-18
 - A-104-23
 - A-104-30 & A-104-31
 - A-104-60
 - A-104-62 through A-104-73
 - A-104-76
 - A-104-78
 - A-301-I through A-301-M
 - A-301-R through A-301-V
 - A-442-19
 - A-442-31
 - A-442-33
 - A-442-39 through A-442-42
 - A-510-A
 - A-510-H
- The defense objects to several Government Exhibits on hearsay grounds. These exhibits fall into the three categories identified below, which the parties expect to brief by Wednesday evening:
 1. GX C-251 is a text exchange between Jane and Kristina Khorram from December 2023 in which Jane reports to Khorram threats the defendant made just prior to release FO videos of her. The Government intends to submit portions of Jane's texts as present-sense impressions, portions to show her state of mind, and the entirety to prove their impact on

Khorram and to prove that after receiving these messages Khorram had reason to know of illegal conduct.

2. GX E-171 is a screenshot of a headline that Jane took when Casandra Ventura filed her lawsuit in November 2023. The Government will offer the screenshot to prove its impact on Jane and not for its truth.
3. GX E-178, E-179, E-182, and E-331-A through E-331-P are all entries that Jane wrote in her Notes App, which she used as a diary during her relationship with the defendant. The Government will offer portions of these notes that relate to Jane's feelings at the time of writing to prove her state of mind. The Government will also offer these notes as prior consistent statements to rebut attacks on her credibility made during opening statements.

Respectfully,

Maurene Comey
Assistant United States Attorney
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From: Teny Geragos <teny@agilawgroup.com>

Sent: Tuesday, June 3, 2025 10:19 PM

To: SubramanianNYSDChambers <SubramanianNYSDChambers@nysd.uscourts.gov>; Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>; Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>; Foster, Meredith (USANYS) <Meredith.Foster@usdoj.gov>; Slavik, Christy (USANYS) <Mary.Slavik@usdoj.gov>; Steiner, Mitzi (USANYS) <Mitzi.Steiner@usdoj.gov>; Smyser, Madison (USANYS) <Madison.Smyser@usdoj.gov>

Cc: Marc Agnifilo <marc@agilawgroup.com>; Alexandra Shapiro <ashapiro@shapiroarato.com>; Anna Estevao <aestevao@harristrz.com>; Jason A. Driscoll <jdriscoll@shapiroarato.com>; nw@westmorelandlawgroup.com; xdonaldson <xdonaldson@aol.com>; thesteellawfirm <thesteellawfirm@msn.com>

Subject: [EXTERNAL] US v Combs - 6/4/25 Trial Issues

Dear Chambers:

The parties have conferred regarding the witnesses for tomorrow.

1. Frank Piazza

We understand that the Court does not need further argument on this and we stand ready to answer any questions on 10C-115 tomorrow morning.

2. Bana Bongolan

The parties disagree on a few defense exhibits and the defense will file a short letter tonight.

3. Jane

The parties have conferred and have substantially narrowed the issues with respect to government exhibits for Jane's direct. This evening, I expect that the government will submit a short letter setting out our positions with respect to those exhibits. We may be able to respond in writing by later this evening.

Respectfully,
Teny



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